

Proposed Regulations to Expand CRT Glass Management Options—Summary of Stakeholder Comments on September 26, 2011 Version

Stakeholder responses related to the proposed draft regulatory language discussed during the September 26, 2011, DTSC public workshop in Sacramento, California are summarized below.

1. Allowing disposal of CRT glass will hinder the development of new recycling solutions for CRT and CRT glass, even in other states.
2. The proposal benefits recyclers who have accumulated glass speculatively.
3. DTSC should allow CRT glass destined for other recycling options to be managed under universal waste handler standards.
4. Various comments on the disposal options—that it is necessary, that the justification for disposal should be simple, etc. Some commenters were concerned about how to ensure that glass is adequately cleaned. Some suggested different payment rates for CEDs whose glass is sent for disposal vs. recycling. Concerns about ensuring that disposal option not be unconditional.
5. Comments that CRT glass is a commodity with commercial value.
6. Suggestions to extend accumulation time and offer partial payment
7. Concerns about how to ensure that a class 2 or 3 (solid waste) landfill that accepts only CRT glass that meets the criteria for disposal.
 - Load rejection should be the landfill operator's prerogative.
 - Landfills that accept CRT glass for disposal should be indemnified; all responsibility should rest with the processor.
 - A database should be developed of processing facilities approved for disposal.
 - Question about the proposed requirement that a class 3 landfill accept CRTs for disposal only in a composite lined portion.
8. Comments on the current state of the CRT glass market
 - Existing glass-to-glass and smelting markets are sufficient.
 - Some feel the problem is overpayment to collectors.
 - Several recycling options (e.g., road bed, fiberglass insulation) are available.
 - California should abolish the payment system and let the market find uses for CRT glass.